

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,
Plaintiff,

vs.

Criminal No. 23-748 KWR

SOLOMON PENA,
Defendant.

SECOND AMENDED

DEFENDANT PENA'S EXHIBIT LIST

Defendant Pena respectfully notifies the Court and counsel of its First Amended Exhibit List for trial of this matter.¹

		CV/CR
Plaintiff’s Attorneys; Patrick E. Cordova Jeremy Pena Ryan Crosswell	Defendant’s Attorney:	United States District Court
	Elizabeth Honce	District of New Mexico
		Trial Dates(s): Starts 9/16/24
Presiding Judge: Kea W. Riggs	Court Reporter:	Courtroom Deputy: C. Bevel

¹ Some exhibits are included for identification purposes only. Inclusion on this list is neither a representation regarding the exhibit's admissibility nor a pledge to move for or stipulate to the exhibit's admission. The Defendant respectfully requests to reserve the right to add certifications as necessary and to amend this list should additional exhibits be identified.

PEN A Ltr.	Witness	Date Off.	Obj .	Adm.	DESCRIPTION OF EXHIBITS
A					Demetrio Trujillo Phone Call No. 17 Dated 07/18/2023
B					Demetrio Trujillo Phone Call No. 40 Dated 06/27/2023
C					Demetrio Trujillo Phone Call No. 44 Dated 06/25/2023
D					Demetrio Trujillo Phone Call No.77 Dated 06/04/2023
E					Complete text messages of Solomon Pena from November 5, 2022, until January 19, 2023.
F					First FBI interview of Jose Trujillo conducted by the FBI and APD on or about January 4, 2023.
G					First interview of Demetrio Trujillo conducted by APD on or about January 5, 2023.
H					Second Interview of Demetrio Trujillo conducted by the FBI.
I					Curriculum Vitae of James C. Fraser-Paige
J					Photo of Blas Baylon-Vega showing off his apparently modified firearm.
K					Photo of Blas Baylon-Vega showing stacks of money.
L					FBI Interview with Steven Michael Quezada Date May 8, 2023
M					Flyer/Handout for Solomon Pena during the 2022 Campaign
N					ShotSpotter Contract

The Defendant Pena reserves the right to use any and all exhibits identified by the United States in their exhibit list.

Dated September 08, 2024.

Respectfully submitted,

By: /s/ Elizabeth A. Honce
ELIZABETH A. HONCE, ESQ.
Attorney for Defendant Solomon Pena

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CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2024, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means as more fully reflected on the Notice of Electronic Filing:

Assistant United States Attorney Jeremy Pena

Assistant United States Attorney Patrick Cordova

Ryan R. Crosswell, CRM, Trial Attorney

COUNSEL FOR THE UNITED STATES

/s/ Elizabeth A. Honce, Esq.

Elizabeth A. Honce, Esq.